

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

|                                 |   |          |
|---------------------------------|---|----------|
| In re Petition of               | ) |          |
|                                 | ) |          |
| NATIONAL TRANSLATOR             | ) | RM-10995 |
| ASSOCIATION                     | ) |          |
| Westminster, Colorado           | ) |          |
|                                 | ) |          |
|                                 | ) |          |
| For Amendment of Part 74 of the | ) |          |
| Commission's Rules to Provide   | ) |          |
| For Displacement Relief         | ) |          |
| For FM Translator Stations      | ) |          |

**COMMENTS OF  
WESTERN INSPIRATIONAL BROADCASTERS, INC.**

Western Inspirational Broadcasters, Inc. ("WIBI") respectfully submits these comments in support of the National Translator Association's PETITION FOR RULEMAKING concerning the proposed Amendment of Part 74 of the Commission's Rules to Provide for Displacement Relief for FM Translator Stations.

WIBI is a non-profit non-commercial educational broadcaster operating three full service primary FM stations, and 42 FM translators serving over 100 small towns and communities in four states in the intermountain west. Our translator service utilizes both reserved and non-reserved frequencies.

The past several years has seen the proliferation of filings by primary stations seeking modification and improvement of facilities, numerous new FM channel allotments, and channel changing as a result of new allotments. Every change has carried with it the potential for displacement of currently licensed FM translators, resulting in the disruption of service which, in many cases, has been in existence for a decade or more.

In the past five years, WIBI has seen nine of its translators displaced. This displacement necessitated the filing of minor modifications to avoid interference to and from the primary stations involved. In each case, WIBI was successful in finding new frequencies to move to under the provisions of the Commission's minor modification procedures, but in four of the filings found it necessary to file for waiver of the rules under 73.1204(d), in order to continue to provide

service. In all nine instances, the restriction of movement within the minor modification guidelines forced WIBI to accept unwanted incoming interference from primary stations. If the currently proposed Amendment had been in place, FM frequencies clear of both incoming and outgoing interference would have been available.

The recent resolution of the court challenge involving the Commission's "point system" in the matter of Non-commercial MX groups, and the upcoming Auction of 290 non-reserved FM channels will soon result in the authorization of numerous new facilities, with the resultant displacement of many FM translators.

A recent study of WIBI's 42 FM Translator licenses reveals that no less than 31 of them will be facing displacement, or significant incoming interference, as these new facilities are authorized. Of these 31, only 20 can be changed under the minor modification procedures currently allowed by the Commission. The remaining 11 would have to cease operation, thereby depriving the public of long established educational FM service.

If the currently proposed Amendment were in place, all but one of the 31 threatened facilities would be able to move to a frequency clear of both outgoing and incoming interference.

WIBI would like to take this opportunity to encourage the Commission to issue a rulemaking proceeding which would incorporate the changes proposed by the National Translator Association in its Petition. The ongoing success of similar rules authorized in the TV service serve to support this proposed displacement relief in the FM service.

Respectfully submitted,

Western Inspirational Broadcasters, Inc.